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District of Nevada
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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CHRISTOPHER ALLEN DISNEY,

Plaintiff,

v.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,

Defendant.

Case No. 2:18-cv-01648-GMN-CWH

**JOINT STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME TO FILE
CROSS-MOTION TO AFFIRM AND/OR
RESPOND TO PLAINTIFF'S MOTION FOR
REMAND.
(First Request)**

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Remand be extended from June 7, 2019 to July 19, 2019. This is Defendant's first request for extension. Good cause exists to grant Defendant's request for extension. In the last two months, Counsel for Defendant (Counsel) had four family tragedies, including the loss of her cousin, his wife, an uncle and a close family friend. Due to the back-to-back deaths, Counsel took time off to attend out of town funeral and prayer services. Counsel also has taken additional leave to care for her elderly mother, who became ill and required surgery in mid-May and had another follow-up surgery this week, with additional follow-up appointments, including the

1 date of the current filing deadline. In addition, Counsel also has over 100+ active social security
2 matters, which require two or more dispositive motions until mid-July. As such, Counsel needs
3 additional time to adequately review the transcript and properly respond to Plaintiff's Motion for
4 Summary Judgment. The parties further stipulate that the Court's Scheduling Order shall be modified
5 accordingly. Defendant makes this request in good faith with no intention to unduly delay the
6 proceedings. Counsel apologizes for the belated request, but made her request as soon as reasonably
7 practicable following her leave.

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9 Respectfully submitted,

10 Respectfully submitted,

11 Dated: June 7, 2019

12 /s/ John Shook
13 (*as authorized by email on June 7, 2019)
14 JOHN SHOOK
15 Attorney for Plaintiff

16 Dated: June 7, 2019

17 NICHOLAS A. TRUTANICH
18 United States Attorney
19 DEBORAH LEE STACHEL
20 Regional Chief Counsel, Region IX
21 Social Security Administration

22 By /s/ Tina L. Naicker
23 TINA L. NAICKER
24 Special Assistant U.S. Attorney
25 Attorneys for Defendant

26 **ORDER**

APPROVED AND SO ORDERED:

25 DATED: June 10, 2019

26 
THE HONORABLE CARL W. HOFFMAN
UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**

2 I, TINA L. NAICKER, certify that the following individual was served with a copy of the
3 **JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO FILE**
4 **CROSS-MOTION TO AFFIRM AND RESPOND TO PLAINTIFF'S MOTION FOR REMAND**
5 on the date and via the method of service identified below:

6 **CM/ECF:**

7
8 John B. Shook
9 Shook & Stone, Chtd.
10 710 S. Fourth St.
11 Las Vegas, NV 89101
12 (702) 385-2220
13 Fax: (702) 384-0394
14 Email: johnshook@shookandstone.com

15 Attorneys for Plaintiff

16 Respectfully submitted this 7TH day of June 2019,

17 /s/ Tina L. Naicker
18 TINA L. NAICKER
19 Special Assistant United States Attorney
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